

John A. Nocera (JAN-3399)  
Peter A. Ragone (PAR-6714)  
ROSNER NOCERA & RAGONE, LLP  
110 Wall Street, 23<sup>rd</sup> Floor  
New York, NY 10005  
(212) 635-2244  
Special Counsel for Plaintiff, Wachovia Bank, National Association

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
WACHOVIA BANK, NATIONAL ASSOCIATION,

07 Civ. 11230 (BSJ)(RLE)

Plaintiff,

-against-

CASA DE CAMBIO MAJAPARA S.A. de C.V. a/k/a  
MAJAPARA CASA DE CAMBIO S.A. de C.V.,

Defendant.  
-----X

**PLAINTIFF'S NOTICE OF  
MOTION FOR JUDGMENT  
AGAINST GARNISHEE  
CITIBANK, N.A.**

**PLEASE TAKE NOTICE** that, upon the annexed Affidavit of plaintiff by Carlos A. Perez, sworn to on the 19<sup>th</sup> day of March 2008, the exhibits annexed thereto, the accompanying Memorandum of Law, and all proceedings had herein, plaintiff Wachovia Bank, National Association ("Wachovia") will move this Court before the Honorable Barbara S. Jones, U.S.D.J., at the United States District Courthouse for the Southern District of New York, located at 500 Pearl Street, Room 18B, New York, New York, at a date and time to be designated by the Court, for an Order:

(a) pursuant to Fed. R. Civ. P. 64 and N.Y. CPLR §6214(d) directing the entry of judgment in favor of Wachovia and against non-party garnishee Citibank, N.A., in a sum of at least \$2,604,438.67, plus appropriate interest thereon and costs; and

(b) directing that non-party garnishee Citibank, N.A. provide full and complete verified disclosure of all property of defendant Casa De Cambio Majapara S.A. de C.V. possessed, maintained or held at non-party garnishee Citibank, N.A. from December 21, 2007 through March 5, 2008, inclusive, and of all transactions involving or related to defendant Casa De Cambio Majapara S.A. de C.V. during such time period; and

c) awarding Wachovia such other, further and different relief against non-party garnishee Citibank, N.A. as the Court deems just, proper and equitable under the circumstances.

PLEASE TAKE FURTHER NOTICE that pursuant to local civil Rule 6.1(b) any opposing affidavits and answering memoranda of law are to be served within ten (10) business days after service herein.

Dated: New York, NY  
March 20, 2008

ROSNER NOCERA & RAGONE, LLP  
Special Counsel for Plaintiff, Wachovia  
Bank, National Association

By: /s/John A. Nocera  
John A. Nocera (JAN-3399)  
Peter A. Ragone (PAR-6714)  
John P. Foudy (JPF-7322)  
110 Wall Street, 23<sup>rd</sup> Floor  
New York, NY 10005  
Tel: (212) 635-2244  
Fax: (212) 635-0533

TO: Citibank, N.A.  
**Attn: Legal Dept.**  
399 Park Avenue  
New York, NY 10043

Reed Smith LLP  
Attorneys for Wachovia Bank, National Association  
**Attn: Scott S. McKessy**  
599 Lexington Avenue  
New York, New York 10022-7650

Tannenbaum Helpert Syracuse & Hirshtritt LLP  
Attorneys for Defendant Casa De  
Cambio Majapara S.A. de C.V.  
**Attn: George F. du Point, Esq.**  
900 Third Avenue  
New York, New York 10022-4775

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